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11  
12 UNITED STATES DISTRICT COURT  
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
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15 UNITED STATES OF AMERICA, ) Case No.: 14-103-CAS  
16 Plaintiff, )  
17 vs. ) DEFENDANT THOMAS  
18 RONALD S. CALDERON; and THOMAS ) CALDERON'S MOTION TO  
19 M. CALDERON, ) DISMISS FOR OUTRAGEOUS  
20 Defendants. ) GOVERNMENT CONDUCT, AND  
21 ) JOINDER IN MOTION TO  
22 ) DISMISS  
23 )  
24 ) Hearing Date: July 13, 2015  
25 ) Time: 1:30 p.m.  
26 ) Place: Courtroom 5

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28 Defendant Thomas M. Calderon, by and through his counsel of record, hereby  
moves to dismiss the indictment for outrageous governmental conduct, and joins in the  
motion to dismiss for outrageous governmental conduct filed by codefendant Ronald  
Calderon. The motion is based on the reasons set forth in codefendant Ronald Calderon's  
motion to dismiss, on any evidence adduced at an evidentiary hearing that may be  
conducted by the court, and on argument of counsel at the time the motion is heard.

29 Date: May 26, 2015

30 By:

31 /s/ Shepard S. Kopp

32 Shepard S. Kopp  
33 Attorney for Defendant  
34 Thomas Calderon